

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CAPELLA PHOTONICS, INC.

Plaintiff,

v.

FUJITSU NETWORK
COMMUNICATIONS, INC.,

Defendant.

CASE No. 2:20-cv-00076-JRG

**EXPERT REPORT OF DR. WAYNE H. KNOX REGARDING INFRINGEMENT
BY FUJITSU NETWORK COMMUNICATIONS, INC.**

I. INTRODUCTION

1. I have been retained as an expert witness by Manatt, Phelps & Phillips, LLP, counsel to plaintiff Capella Photonics, Inc. (“Capella”) in the matter of Capella Photonics, Inc. v. Fujitsu Network Communications, Inc., Case No. 2:20-cv-00076-JRG. My qualifications and other considerations are set forth below.

2. I have been asked to prepare an opinion as to whether Fujitsu Network Communications, Inc. (“Fujitsu” and/or “FNC” in this report) has infringed certain claims from U.S. Patent No. RE47905 (the “’905 Patent”), specifically Asserted Claims 23-24, 29, 37, 44 and 45, to explain the technology, the patented elements and the corresponding products from Fujitsu. I submit this expert report in compliance with Federal Rule of Civil Procedure 26(a)(2). I reserve the right to supplement or amend this Report pursuant to Rule 26(e) and as otherwise provided if additional data or other information that affects my opinions becomes available. I expect to testify at trial regarding the matters expressed in this Report and any supplemental reports that I may prepare for this litigation. I also may prepare and rely on audiovisual aids to demonstrate various aspects of my testimony at trial. I also expect to testify with respect to any matters addressed by any expert testifying on behalf of Fujitsu, if asked to do so.

3. I am being compensated at my standard consulting rate of \$500.00 per hour for my work in connection with this action. I am separately being reimbursed for any out-of-pocket expenses. My compensation is not based in any way on the outcome of the litigation or the nature of the opinions I express.

II. QUALIFICATIONS

4. Below I provide a summary of my qualifications. The details of my qualifications can be found in my Curriculum Vitae, which is attached to this Report as **Exhibit A**, and which includes my detailed employment background, professional experience, and list of technical publications and patents.